

AFM:ANR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

24-MJ-442

ANDRE PERSAUD,

(T. 18, U.S.C., § 2252(a)(2))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DONALD SPIECE, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Between in or around May 2023 and June 2024, within the Eastern District of New York and elsewhere, the defendant ANDRE PERSAUD did knowingly and intentionally receive one or more visual depictions using one or more means and facilities of interstate and foreign commerce, to wit: videos, that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(2)).

The source of your deponent's information and the grounds for his belief are as follows¹:

1. I am a Special Agent with the FBI and have been since February 2023. During my tenure with the FBI, I have participated in the investigation of cases involving crimes against children. Specifically, I have experience investigating cases involving production, receipt, distribution, and possession of child pornography and have conducted physical and electronic surveillance, executed search warrants, reviewed and analyzed electronic devices and interviewed witnesses. As a result of my training and experience, I am familiar with the techniques and methods of operation used by individuals involved in criminal activity to conceal their actions from detection by law enforcement.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances of this investigation from my personal participation in the investigation, my review of documents, my training and experience and discussions I have had with other law enforcement personnel concerning the creation, distribution and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. On or about June 25, 2024, pursuant to a judicially authorized search warrant, I conducted a search of an Apple iPhone 13 Pro (the "DEVICE") belonging to

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

ANDRE PERSAUD. PERSAUD provided his password to FBI agents to access the DEVICE. Upon manually reviewing the DEVICE, FBI agents identified that there was child sexual abuse material (“CSAM”) on the DEVICE.

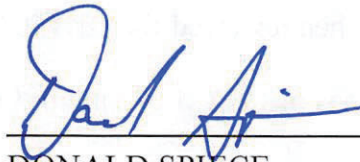
4. I then reviewed the DEVICE and confirmed that it contained approximately 150 videos of CSAM of a minor female victim (“Minor Victim-1”). For example, there were, among others: (1) a thirty-eight-second video of Minor Victim-1 inserting a hairbrush into her vagina; (2) a twenty-second video of Minor Victim-1 masturbating and displaying her vagina and anus; and (3) a twelve-second video of Minor Victim-1’s vagina and of her masturbating in the shower. I reviewed, among other communications, text messages sent by PERSAUD requesting photos and videos of Minor Victim-1, who was 15 years old at the time these photos and images were created.

5. In an interview with Minor Victim-1, she stated that PERSAUD demanded that she cut his name into her body, and she complied with his demand. The DEVICE indeed contained at least two photographs which show that Minor Victim-1 carved “Andre” into her arm. Additionally, the DEVICE contained at least six images that Minor Victim-1 sent to PERSAUD over text messages, which similarly show that she cut his name into her body. One of the images sent by Minor Victim-1 shows fresh blood around the cut, indicating that she had cut his name into her body a short time before the photo was taken.

6. Prior to his arrest, during a voluntary interview with FBI agents, PERSAUD admitted that he had used numerous social media applications to request and

receive CSAM from female victims, and that he was aware that the persons depicted therein were minors.

WHEREFORE, I respectfully request that PERSAUD be dealt with according to law.



DONALD SPIECE
Special Agent
Federal Bureau of Investigation

Sworn to before me this
25th day of June, 2024



THE HONORABLE TARYN A. MERKL
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK